

Participant Protections Policy & Procedure PP4

Participant Safety & Wellbeing Policy statement

Grow Support Inc. (GROW) is committed to promoting and protecting individual rights and maximising the choice and control of participants in decisions about their lives. This policy outlines the role of safeguarding supports and mechanisms to ensure the safety of participants and the quality of services.

This section of the document contains the scope of the relevant policy, principles, definitions, linked policies and relevant legislation and service standards.

GROW is dedicated to providing an environment where participants to whom it provides services are protected from abuse, neglect or harm and where staff work according to our values.

GROW is committed to personal safety and the right of participants to live in dignity and security without fear of threat or harm and to be free from exploitation and abuse.

Our organisation has a duty of care to all staff and participants. GROW will respect the participants dignity of risk as long as it does not adversely impact upon the organisation's duty of care obligations.

GROW will ensure they fulfil their duty of care to participants and staff by ensuring that appropriate working standards and care standards are met.

Scope

All staff, whether paid employees or Management Committee members, are responsible for working within this policy and reporting issues when participant safeguarding is not adequate.

This policy applies to GROW Management Committee members and all staff including permanent and casual staff, contract workers, temporary and agency workers. Anyone working with or for GROW is expected to be familiar with this policy and use the approved procedures.

This policy is owned by the GROW Management Committee.

Participant Safety & Wellbeing Policy

This section of the document contains the scope of the relevant policy, principles, definitions, linked policies and relevant legislation and service standards.

We have developed and implemented a number of policy & procedures and supporting documentation to ensure the organisation and facilities are safe environments for participants.

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GROW will be responsible for:

- ensuring the physical environment is safe
- conducting thorough screening of staff working with participants
- assisting and supporting participants to assess and manage risks
- supporting participants to safely and effectively manage medication
- providing all staff with information and training on duty of care
- ensuring that clients are protected from abuse or neglect and that any incidents of harm are promptly addressed and investigated
- providing staff with an induction and relevant training
- regularly review staff levels to ensure appropriate levels of care

Participant Safety & Wellbeing Principles

- Safeguarding improves safety and wellbeing, while imposing the least possible restriction on a participant and their choices.
- Safeguards are responsive to the participant's circumstance and are relevant to the risk within these circumstances. These factors may change over time.
- Every participant should be supported to develop their individual skills and capacity and be involved in determining their own safeguards.
- Participants who need and want support to make decisions will be supported to exercise choice.
- Safeguards can be informal or formal and work at a participants and/or organisational level.
- A participants' money or other property is only used with their consent and for the purposes they intended.
- Supports are provided based on the least intrusive options that meet the participant's needs and help them to achieve desired outcomes.

Participant Safety & Wellbeing Key actions

A defined structure is implemented by the Management Committee to meet a GROW's financial, legislative, regulatory and contractual responsibilities. This includes a process that monitors and responds to quality and safeguarding matters associated with delivering supports to current participants.

Where a participant has specific needs, which require monitoring and/or daily support, workers are appropriately trained and understand the participant's needs and preferences.

The Operations Manager will make reasonable adjustments to the support delivery environment as needed and monitor this to ensure that it is fit for purpose and each participants health, privacy, dignity, quality of life and independence are supported.

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The Risk Management Plan is developed and implemented by the Operations Manager will include risks to a participant's financial, health and safety risks, and risks associated with provision of supports. This plan will identify, analyse, prioritise and document the strategies to address these risks. Where appropriate the Management Committee will be involved in the development and approval of plan content.

Where staff are engaged in providing supports in the participant's home, the Operations Manager will undertake preparative work with the participant to ensure a safe support delivery environment is in place prior to commencing these activities.

If participants are supported by other services the Operations Manager will work in conjunction with their representatives to identify and minimise risks that ensure a safe environment.

All staff are trained and supervised to ensure that participants are not given any financial advice or information other than that which would reasonably be required under the participant's support plan.

Staff will maintain records that clearly identify the medication and dosage required by each participant, including all information required to correctly identify the participant and to safely administer the medication. For more detailed information please see the full Medication Policy & Procedure.

The Operations Manager will provide each participant with information about the use of an advocate and access to an advocate is facilitated where allegations of violence, abuse, neglect, exploitation or discrimination have been made. For more detailed information please see the full Advocate Policy & Procedure.

Allegations and incidents of violence, abuse, neglect, exploitation or discrimination, are acted upon. Each participant affected is supported and assisted, records are made of any details and outcomes of reviews and investigations are detailed in the relevant Register. The Operations Manager will undertake the required actions to prevent similar incidents occurring again.

Definitions

Safeguarding - actions designed to protect the rights of participants to be safe from the risk of harm, abuse and neglect, while maximising the choice and control they have over their lives.

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Participant Safety & Wellbeing Procedures

This section of the document contains the scope of the relevant procedure, the allocated roles and responsibilities, detailed actions to be undertaken, timelines and specifies the relevant forms and other documents to be used.

This procedure explains how GROW will implement its policy for safeguarding both generally and around the participants it supports.

Participant Safety & Wellbeing Planning and Support

GROW uses a values-based approach to our recruitment processes. This ensures that our staff is able to contribute to the participants culture of and their human rights, including the right to be free from harm, abuse and neglect.

All prospective staff are required to undergo pre-employment screening before being offered a position at GROW. Please see our full Suitability & Recruitment Policy & procedure for more information.

Staff are required to complete mandatory safeguarding training as identified by the Operations Manager. The Operations Manager is required to support the ongoing understanding of direct care staff on issues relating to safeguarding by providing information, professional development and supervision support on a case by case needs basis.

The Operations Manager will:

- develop individual safeguarding strategies with each participant
- undertake safeguard planning that considers the participants situation and their strengths
- includes within the process any potential risks, corresponding safeguards and strategies to build the participant's capacity and skills.
- balance the participants freedom to make decisions against meeting our duty of care responsibilities.
- support participants to make informed decisions and choices whilst being aware of any risks or consequences involved.

Where the participant is unable to assess and recognise risks in a particular circumstance the Operations Manager will provide direct support in the decision making process.. If this is the case, the nominated advocate should also be involved in the consideration and determination of a participant's safeguards.

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Handover notes between staff or with other service providers must include formal advice of safeguarding requirements as part of GROW's duty of care. As with all participant related information this is undertaken subject to any legal privacy considerations and the consent of the individual participant.

All staff are required to ensure detailed, accurate and up-to-date records and information are maintained for GROW to meet its legal, contractual and mandatory reporting requirements. GROW relies on this information, and information from participants, families, advocates and other key stakeholders to regularly monitor individual participants service delivery and inform our annual organisational review.

The process of collecting participant information and undertaking reviews assists staff and the Operations Manager to identify early warning signs for service issues and identifies potential areas for our Continuous Improvement Plan.

Staff members must record any concerns in the individual participant progress notes and advise the Operations Manager. Refer to the Incident Management Policy and Procedure if an Incident Report is required. All Incident Reports must be completed and lodged as per the Incident Management Policy & Procedure.

Where an incident occurs, the Operations Manager will make basic inquiries about the factual circumstances of a matter but will not undertake an investigation where the nature of the incident requires the police to be notified. The Operation Manager will advise the Management Committee immediately if there is a concern or allegation relating to abuse, neglect or exploitation.

Participant Safety & Wellbeing Responsibilities

All staff are responsible for safeguarding the wellbeing and safety of participants. Any staff member that becomes aware of a risk to a participant, whether this is a concern or a specific incident must report it immediately to the Operations Manager or their direct supervisor.

The Operations Manager is responsible for the implementation and monitoring of this procedure and must record any concern or allegation and follow the relevant procedure to minimise harm and prevent further occurrence or escalation.

Participant Safety & Wellbeing Reporting

The Operations Manager will:

- complete and lodge Incident Reports and supporting documents in line with the Incident Management Policy & Procedure.
- enter the relevant information in the Incident Register
- enter the relevant information in the individual participants file

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- provide the Management Committee with a report outlining any changes required in policy and/or practices to prevent similar incidents from occurring again.

Participant Safety & Wellbeing Review and Evaluation

Any time there are concerns or allegations about abuse, neglect or harm, once the risk or incident has been responded to, the Operations Manager will undertake actions with relevant participants and staff that will minimise the risk of the issues or issues accruing again.

The Operations Manager will engage with relevant stakeholders including the affected participant, families, advocates and staff to identify any strategies, systems, process or practice improvements that could be applied. This information will be included within the organisations Continuous Improvement Plan.

These Policies & Procedures will be reviewed every 12 months or sooner where risks and improvements are identified. GROW will routinely monitor the National Disability Insurance Scheme Quality and Safeguarding Framework and State Government policy and guidelines on safeguarding to keep track of changes that make impact on our service requirements.

Any breach of this policy or procedure by staff, Management Committee members will render the person liable to disciplinary action, and/or criminal proceedings.

The Management Committee will consider and decide if and when disciplinary procedures shall be commenced, if the matter relates to staff negligence.

Physical Environment

It is the responsibility of GROW to minimise physical risks to participants. The organisation will meet reasonable community standards and comply with all legal requirements affecting the physical and environmental safety of participants. This includes fire safety, motor vehicle safety, water safety and public health requirements.

The Operations Manager will implement an annual review process and update our compliance with community standards, NDIS standards and relevant legal requirements.

GROW will comply with fire risk management guidelines which outline specific requirements relating to, furnishings, smoke detection systems, fire extinguishing equipment, means of exit, fire prevention, fire safety management, evacuation capability, fire and emergency evacuation plans, emergency procedures and maintenance of essential fire safety services.

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Staff must be trained in relation to these guidelines. It is the responsibility of the Operations Manager to ensure that these compliance requirements are met.

Participant Safety & Wellbeing Staff Screening

Prior to commencing work with participants, all staff will undergo a comprehensive disability worker screening process which will include criminal record check, referee checks and interviews. The findings of the screening are to be documented in the personnel files of staff. Please see our HR Policy & Procedures for more detailed information.

Risk Assessment

A risk assessment will be undertaken by staff jointly with participants at each stage of care. Participants will be supported to identify and manage risks in their own environment and in any activities, they undertake by working closely with the Operations Manager.

Participants will be provided with easy to read information regarding risks and how they can be reported to the GROW in order to be eliminated or mitigated. Similar information may also be made available to participant advocates to assist in the identification process, where participants do not have the capacity to understand risks to their personal safety. Please see our Safeguarding Policy & Procedures for more detailed information.

Risk Management

Where risks of harm are identified, a range of harm minimisation strategies will be discussed with the participant and family or advocate (where relevant). Agreed actions will then be documented in the participants file.

Risk management and harm minimisation strategies will minimise and wherever possible eliminate the need for restraint.

All risk assessments and harm minimisation plans will be documented and included in the participants file. Please see our Risk Management Plan for more detailed information.

Medication Management

Staff involved in the storage, transportation and administration of medication will be trained in the GROW medication policy and procedures and assessed as competent prior to undertaking any medication function. Please see our Support Provision Policy & Procedures for more detailed information.

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Incident Management and Record Keeping

All incident related records will be recorded on the Incident Register stored securely and only accessed by management personnel with a legitimate reason. Please see our Support Provision Policy & Procedures for more detailed information.

Staff Induction and Training

All staff and Management Committee members will participate in an induction program prior to commencement in their roles. The induction program will include training on duty of care, risk assessment and management, professional boundaries, medication handling, fire safe, feedback & complaints management, code of conduct and ethical behaviour. Please see our HR Policy & Procedures for more detailed information.

Money Handling

All staff will act with probity and efficiency in handling participant's finances and assets. Where a participant requires assistance with financial management, such tasks must be identified on a participant profile.

GROW staff are not to provide service user's with financial advice or information beyond what would be identified in the participant profile.

Upon accessing stored cash belonging to a participant to assist with budget management, shopping, payment or bills and other financial matters, all staff are obliged to:

- count the cash and check that it matches the recorded current balance in the running sheet every time cash storage is accessed.
- report to the Operations Manager immediately if a discrepancy is found,
- if there is a discrepancy, write the event into the running sheet/daily sheets

Staff must obtain a receipt for every transaction. When a receipt is not given details of the purchase must be written on paper and filed as a receipt.

Staff are responsible for the security of cash and items of a personal nature taken on outings with a participant. Staff may be required to replace cash or items lost whilst on outings with participants if it is established that the loss was contributed to by act or omission of the staff member on duty.

Where a participant may wish to undertake an activity whereby a companion discount may not be used to obtain entry for staff should discuss this with the Operations Manager to seek management assistance on the matter. Prior to the activity being undertaken, written acknowledgment between the participant and GROW must be documented regarding who will be responsible for associated costs.

In the event that a participant may need to be reimbursed for costs incurred during

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the course of care delivery, this must be discussed with GROW management prior and documented in writing. Once agreed to by both parties, the service user must then submit receipts to the Operations Manager who will complete the reimbursement.

Health and Well Being

GROW staff recognise that being healthy enables participants to function in family and community life and that health is a complete state of physical, mental and social wellbeing, not merely the absence of disease or infirmity. To achieve this goal GROW adopts a person centred active support approach to ensure that all participants have the opportunity to be involved in healthy lifestyles.

GROW aims to promote and improve the health and wellbeing of all participants by:

- promoting physical activity and active communities
- promoting accessible and nutritious food
- promoting mental health and wellbeing
- reducing and minimising harm from alcohol and other drugs
- providing safe environments to prevent unintentional injury
- encouraging participants to carry out regular health checks (including undertaking annual medical checks for participants)
- monitoring known health conditions to reduce hospital admissions and illness.

Whilst promoting the health and wellbeing of all participants, staff at GROW recognise that dignity of risk must be respected for each participant. At the same time, the health and wellbeing of staff must not be compromised.

A duty of care will take precedence over the right of participants to take calculated risks where that risk may pose a threat to the health and/or safety of the participant and/or others. Staff will be expected to use their professional skills and experience to decide on what actions they should take in each situation of potential harm.

In instances whereby participants wish to smoke or utilise drugs and alcohol, GROW respects their right to undertake such activities in private. Participants are to refrain from these activities whilst staff are present on shift. In the event that such activity takes place whilst staff are present on shift, staff have the right to remove themselves from the environment and must contact the Operations Manager to advise of the situation and subsequently complete an incident report.

By removing themselves from the environment, staff are not considered to be abandoning their duty of care. The Operations Manager will report such activity to the clients funding body, Case Manager etc. All staff are required to comply with the NDIS Code of Conduct HR5 endorsed by Management Committee which sets out standards of conduct when providing services to participants. The code of conduct

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is supported by GROW's grievance procedure to address breaches of the code of conduct.

The Operations Manager will ensure that all staff who work with participants or who have access to their personal records have ongoing support and training to develop, enhance and maintain a safe environment.

GROW will promote the involvement of participants and advocates in service development planning where relevant, and inform them of their rights and how to access grievance procedures where relevant

Key Contact

For further information and support about implementing this Policy & Procedure please contact the Operations Manager.

Relevant documents

- Incident Register R1
- OH&S Register R9
- Risk Management Plan
- Risk Register

Relevant legislation and standards

- Practice Standard 1. Rights & Responsibilities
- Practice Standard 4. The Support Provision Environment
- Practice Standard 3. Provision of Supports

Privacy & Dignity Policy statement

Grow Support Inc, (GROW) affirms and respects the right of each participant to privacy and confidentiality in all aspects of his or her life.

Our services are delivered in ways that respect the dignity of participants and their families. GROW further ensures the confidentiality and security of the personal information of other parties including staff and Management Committee members.

We will protect privacy and ensure that the collection, storage, use and disclosure of any personal information collected comply with the relevant legislation.

Privacy & Dignity Policy Purpose

This policy describes the principles of privacy that GROW adheres to and the measures that are taken to protect clients' privacy, to maintain personal dignity and to keep information confidential to those who have a right and need to know.

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This policy also describes how private information of other parties is protected.

Scope

All staff have a general responsibility to keep confidential any private information regarding participants, Management Committee members or other staff. This commitment extends to collecting and recording only such information as is required by management for service provision and to restricting access to such information to authorised persons except for the purpose of urgent medical treatment.

All staff have a further general responsibility to respect the physical privacy of participants and other parties and for delivering services in ways that supports their dignity.

The Operations Manager is responsible for ensuring that staff are trained in the requirements of this policy. The Operations Manager is further responsible for ensuring that approvals are in place for the disclosure of information where it is required externally and that all service provision information is kept secure.

Definitions

Privacy: Privacy is the state of being free from intrusion or disturbance in one's private life or affairs. This is also referred to as "the right to privacy".

Physical Privacy: Physical Privacy refers to the right to have access to a separate and individual space in particular in relation to personal use of bedrooms and bathrooms.

Dignity: Dignity refers to an individual's innate right to respect and ethical treatment.

Confidentiality: Confidentiality is the act of keeping secure and private all information (verbal and written) that has been entrusted to you in confidence. It also implies the act of limiting access to, or usage of, such information to authorised persons.

Security and Integrity of Information: Security refers to physical measures to restrict access to information such as by locking filing cabinets. Integrity refers to the act of keeping information free from unauthorised alteration or corruption.

Disclosure: Disclosure is the transfer of information to a third party outside the organisation.

Use of Information. Use refers to the handling of information within an organisation in relation to the primary purpose for which it was collected.

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The full Privacy and Dignity Policy is made available to anyone using our services who request it.

Protection of Human Rights & Freedom from Abuse Policy statement

Grow Support Inc. (GROW) believes that the safety and best interests of the person who is the subject of suspected or alleged abuse, assault or neglect is paramount.

Service Users and their families, and GROW staff should:

- understand their rights
- be aware of what constitutes abuse, assault and neglect
- be aware of signs and indicators

Staff will be trained and supervised in the prevention and protection of participants from abuse and be committed to ensuring their safety.

Response to allegations of abuse or neglect shall occur promptly, sensitively and confidentially to protect the person from further harm and offer the person the medical, psychological and legal assistance to which they are entitled.

Staff, participants, carers, family members or advocates should be aware that any allegations or suspected instances of abuse or neglect should be reported.

Scope

This policy and procedure will apply to all staff, Management Committee members and participants of GROW.

Protection of Human Rights & Freedom from Abuse Policy

This section of the document contains the scope of the relevant policy, principles, definitions, linked policies and relevant legislation and service standards.

The GROW Management Committee has the overall responsibility to ensure that each participant who uses our service accesses supports free from violence, abuse, neglect, exploitation or discrimination.

The policies, procedures and related documents we have guiding the organisations participant supports actively prevent violence, abuse, neglect, exploitation or discrimination. GROW provides each participant with easy to read information about the use of an advocate and access to an advocate. This is facilitated by the Operations Manager where allegations of violence, abuse, neglect, exploitation or discrimination have been made.

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The Operations Manager is responsible for the ongoing supervision of staff to ensure that they follow the relevant organisational policies and procedures relating to any allegations, incidents, violence, abuse, neglect, exploitation or discrimination.

The Operations Manager will carry out investigations and reviews in line with our policies and ensure that each participant affected is supported and assisted, records are made of any details and outcomes of reviews and investigations and action is taken to prevent similar incidents occurring again.

Protection of Human Rights & Freedom from Abuse Procedures

This section of the document contains the relevant procedure, the allocated roles and responsibilities, detailed actions to be undertaken, timelines and specifies the relevant forms and other documents to be used.

GROW recognises the right of participants to protection, regardless of gender, race, culture and disability.

We recognize the power dynamics inherent in working with participants and the potential for abuse and exploitation by staff of people we work with.

GROW is committed to creating and maintaining an environment which promotes its core values and prevents abuse and exploitation of all participants. GROW staff are expected to uphold the dignity of all participants with whom they come into contact by ensuring that their personal and professional conduct is of the highest standards at all times.

GROW recognises the unique needs of our participants and, therefore, commits itself to creating & maintaining an environment that protects these individuals.

GROW staff and Management Committee are prohibited from causing any physical or emotional harm to participants. GROW staff and Management Committee are prohibited from the exchange of money, employment, goods, or services for sex, including sexual favors.

GROW staff and Management Committee are prohibited from any form of humiliating, degrading, or exploitative behaviour toward participants.

GROW staff and Management Committee are not to use their power or position to withhold assistance or services, or to give preferential treatment. Staff are prohibited from using their power or position to request or demand payment, privilege, or any other benefit.

Staff & Management Committee are obliged to report any concern or suspicion of exploitation and abuse of a participant. Failure to report may put the participant and

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GROW at risk and is a breach of the Safeguarding Policy and the GROW Code of Conduct.

Staff should report concerns by staff from other organisations through established reporting mechanisms.

GROW is adheres to the highest human resource and recruitment standards to safeguard people we work with against exploitation and abuse.

This includes:

- safe recruitment – referencing and vetting prospective applicants with emphasis on good employment track record in carrying out their work in conformity with the Code of Conduct.
- Induction – all staff have completed an induction on the GROW Code of Conduct, and all relevant policy & procedures.

Key Contact

For further information and support about implementing this Policy & Procedure please contact the Operations Manager.

Relevant documents

- Code of Conduct HR5

Relevant legislation and standards

- Practice Standard 1. Rights & Responsibilities
- Practice Standard 3. Provision of Supports

Cultural & Linguistic Diversity Policy statement

Grow Support Inc. (GROW) recognizes the cultural diversity of the regions where we provide services. We are committed to the right of all participants to live their culture beliefs and heritage and work towards equal opportunities to all participants regardless of their values, beliefs and cultural backgrounds.

Scope

Our services policies & procedures and supporting documents ensures equality of access and participation in all activities. This includes responding to the cultural or diversity needs of participants in the development and implementation of their plans and activities.

Cultural & Linguistic Diversity Policy

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This section of the document contains the scope of the relevant policy, principles, definitions, linked policies and relevant legislation and service standards.

Our staff are recruited from the culturally diverse greater Moreton Bay, Logan and Brisbane North areas and are supported by our induction, training and supervision to understand and respect individual values and beliefs of all GROW participants.

Our continuous improvement process includes reviewing how we address and meet the needs of participants from culturally diverse backgrounds and how we improve the quality of service documentation and processes for all participants in the future.

GROW uses its community links with various community groups and leaders for information sharing and access to suitable participant activities that support their needs and wants.

Cultural & Linguistic Diversity Procedures

This section of the document contains the scope of the relevant procedure, the allocated roles and responsibilities, detailed actions to be undertaken, timelines and specifies the relevant forms and other documents to be used.

The GROW Operations Manager will ensure equality of access and participation in GROW services.

Our staff and Management Committee led by the Operations Manager will encourage people from diverse cultural backgrounds to join our staff and Management Committee.

The Operations Manager will undertake formal and informal promotional activities of GROW services within the multicultural communities in our area of service delivery. GROW will develop and respond to the cultural, linguistic and religious needs of our participants in order to develop and implement participant support plans effectively.

GROW will network with and make use of local ethnic community leaders to undertake referral and information sharing where relevant to a participant support needs if required.

The Operations Manager will ensure that the service meets the requirements provided within the Anti-Discrimination and Equal Employment Opportunity in the recruitment of GROW staff and Management Committee members.

The GROW staff and Management Committee intake and orientation process includes a focus on developing an understanding and respect for cultural needs and practices of participants and their families.

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The Operations Manager will be responsible for maintaining the capacity of GROW to meet the needs of participants from a culturally diverse backgrounds through the use of the organisation's continuous improvement processes.

During the intake assessment or support plan review process should the participant have a need for a support worker from a specific cultural background GROW will attempt to meet this need (dependant on resources and availability)

Relevant legislation and standards

- Practice Standard 3. Provision of Supports

Key Contact

For further information and support about implementing this Policy & Procedure please contact the Operations Manager.

Approvals

Date of approval: 8th April 2021

Date of review: April 2022

Signature of Operations Manager:

